



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

**ZACHARY CARTER**  
Corporation Counsel

**ANDREW LUCAS**  
Senior Counsel  
Phone: (212) 356-2373  
Fax: (212) 356-3509  
alucas@law.nyc.gov

May 27, 2016

**By ECF**

Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Vincent v. Winski, et. al.  
14 CV 7744 (VSB)

Your Honor:

I am a Senior Counsel in the office of Zachary Carter, Corporation Counsel of the City of New York, representing defendants in the above-referenced civil rights matter. Defendants submit this proposed schedule for supplemental briefing on the pending motion to dismiss, docket [52], per the Court's instructions at the May 12, 2016 conference.

On review of plaintiff's proposed second amended complaint defendants believe that supplemental briefing to accompany the motion to dismiss, filed April 4, 2016, docket [52], will be sufficient to address, *inter alia*, the modifications to plaintiff's Monell theories, the consolidation issue raised at the May 12, 2016 conference, the futility of the proposed second amended complaint, and to ensure there is clarity about the claims and defendants who are no longer part of this case based on the proposed amendments.

On consent defendants request fifteen additional pages for their supplemental brief, and plaintiff requests fifteen additional pages for their opposition. Defendants request until June 16, 2016 to submit supplemental papers, and plaintiff requests until July 22, 2016 to oppose. Reply will be submitted by August 10, 2016.

Thank you for your consideration.

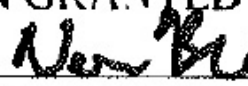
Respectfully submitted,

/s/

Andrew Lucas  
Senior Counsel

cc: *By ECF*  
Wylie Stecklow  
Stecklow, Cohen and Thompson  
217 Centre Street, 6<sup>th</sup> Floor  
New York, NY 10013  
Wylie@wylielaw.com

Application granted. Plaintiff is granted leave to file the Second Amended Complaint attached to his May 10, 2016 letter, (Doc. 63-1), on or before June 3, 2016. The proposed briefing schedule, with excess pages, as set forth herein is hereby granted. So ordered.

**APPLICATION GRANTED  
SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J.**

6/1/16